

1 HEATHER E. WILLIAMS, CA Bar #122664  
Federal Defender  
2 LISA N. LUMEYA DC BN # 90017392  
Assistant Federal Defender  
3 Office of the Federal Defender  
2300 Tulare Street, Suite 330  
4 Fresno, CA 93721-2226  
Telephone: (559) 487-5561  
5 Fax: (559) 487-5950

6 Counsel for Defendant  
JUAN C. AVILA  
7

8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 JUAN C. AVILA,

15 Defendant.  
16

Case No. 1:24-cr-00053-JLT

STIPULATION TO TERMS OF TEMPORARY  
RELEASE; ORDER

Date: July 18, 2025

Time: 2:00 p.m.

Judge: Hon. Erica P. Grosjean

17 In response to this Court's Order, the parties through their respective counsel, Assistant  
18 United States Attorney Chan Hee Chu, counsel for plaintiff, and Assistant Federal Defender Lisa  
19 N. Lumeya, counsel for Juan Carlos Avila, provide the following stipulation with proposed terms  
20 of temporary release. *See* ECF No. 20.

21 If this Court grants Mr. Avila's motion for temporary release to appear at his scheduled  
22 state court hearing, Mr. Avila's third-party custodian, Ms. Barbara Gutierrez, has made the  
23 necessary arrangements to closely accompany him throughout the approved travel. In addition to  
24 confirming childcare, Ms. Gutierrez has also secured a vehicle and booked a hotel room. The  
25 parties propose Mr. Avila be temporarily released from the Central Valley Annex into Ms.  
26 Gutierrez's custody on Monday, July 21, 2025. Ms. Gutierrez is prepared to transport Mr. Avila  
27 from Central Valley Annex, located at 254 Taylor Avenue, McFarland, California, 93250, to the  
28 Clark County District Court, located at 1200 Franklin Street, Vancouver, Washington, 98660. The

Clark County District Court is located about 850 miles from the Central Valley Annex, and the estimated travel time by car is at least about thirteen hours. Ms. Gutierrez has rented one hotel room for her and Mr. Avila to share from Tuesday, July 22, to Wednesday, July 23. On Wednesday, July 23, Ms. Gutierrez would accompany Mr. Avila to his scheduled court appearance at 1:30 p.m. at the Clark County District Court. At the conclusion of his case-related proceedings, Ms. Gutierrez would then immediately accompany Mr. Avila back to the Central Valley Annex to return by Friday, July 25, 2025.

Accordingly, the parties respectfully request that proposed terms be imposed.

Respectfully submitted,

KIMBERLY A. SANCHEZ  
Acting United States Attorney

Date: July 18, 2025

/s/ Chan Hee Chu  
CHAN HEE CHU  
Assistant United States Attorney  
Attorney for Plaintiff

HEATHER E. WILLIAMS  
Federal Defender

Date: July 18, 2025

/s/ Lisa Ndembu Lumeya  
Lisa N. Lumeya  
Assistant Federal Defender  
Attorney for Defendant  
JUAN AVILA

**ORDER**

Upon consideration of Defendant Juan Carlos Avila's (USMS No. 18650-032) motion for temporary release, IT IS HEREBY ORDERED that the motion is GRANTED. Mr. Avila shall be released from Central Valley Annex to the custody of his third-party custodian, Barbara Gutierrez, at 8:00 a.m. on Monday, July 21, 2025. Ms. Gutierrez shall transport and closely accompany Mr. Avila to his court appearance at 1:30 p.m. at Clark County District Court, located at 1200 Franklin Street, Vancouver, Washington, 98660. Immediately following the conclusion of his case-related proceedings, Ms. Gutierrez will transport and return Mr. Avila directly to the Central Valley Annex by Friday, July, 25, 2025.

While on temporary release, Mr. Avila is ordered to obey all laws and imposed conditions, and remain at all times in the presence of Ms. Gutierrez.

IT IS SO ORDERED.

Dated: July 18, 2025

/s/ Eric P. Groj  
UNITED STATES MAGISTRATE JUDGE